

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
ADEN KAHSSAI
3 Assistant Federal Public Defenders
Nevada Bar No. 15581
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Aden_Kahssai@fd.org

7 Attorneys for Raul Rosales-Villegas

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 United States of America,
12 Plaintiff,
13 v.
14 Raul Rosales-Villegas,
15 Defendant.

Case No. 2:23-cr-00044-GMN-MDC

STIPULATION FOR EXTENSION
OF TIME TO FILE OBJECTIONS
TO REPORT AND
RECOMMENDATION (ECF 80)
(Second Request)

16
17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
19 Frierson, United States Attorney, and Edward Veronda, Assistant United States
20 Attorney, counsel for the United States of America, and Rene L. Valladares,
21 Federal Public Defender, and Aden Kahssai, Assistant Federal Public Defenders
22 and counsel for Raul Rosales-Villegas, that the Objections to Report and
23 Recommendation (ECF No. 80) currently due February 20, 2024 be extended to
24 March 21, 2024.

25 This Stipulation is entered into for the following reasons:
26

1 1. On January 5, 2024, this court issued a Report and Recommendation
2 (ECF No. 80) recommending that Mr. Rosales-Villegas' Motion to Suppress and
3 Motion to Dismiss be denied. The Report and Recommendation also ordered that
4 the evidentiary hearing as well as the *Franks* hearing be vacated.

5 2. The parties are engaged in negotiations to resolve this case. An
6 extension on the deadline to file objections to the Report and Recommendation is
7 necessary to allow the parties to see the resolution of this case or move forward
8 with objections.

9 3. The parties agree to the continuance.

10 4. The defendant is in custody and agrees with the need for the
11 continuance.

12 This is the second request for an extension of time.

13 DATED this 15th day of February, 2024.

14 RENE L. VALLADARES
15 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

16 By /s/ Aden Kahssai

17 ADEN KAHSSAI
18 Assistant Federal Public Defender

 By /s/ Edward Veronda

19 EDWARD VERONDA
20 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 United States of America,
4 Plaintiff,

5 v.


6 Raul Rosales-Villegas,
7 Defendant.
8

Case No. 2:23-cr-00044-GMN-VCF

ORDER

9
10 IT IS THEREFORE ORDERED that the Objections to Report and
11 Recommendation (ECF 80) currently due February 20, 2024 be extended to May
12 21, 2024.

13 DATED this 19 day of February, 2024.

14
15 
16 UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26